

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Kateryna SAMARSKA (21)

Ukraine

Case No.

L-20-MJ-

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 28, 2020 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 1544

Offense Description

did willfully and knowingly use, or attempt to use, a passport issued or designed for the use of
 another;

This criminal complaint is based on these facts:

On or about February 28, 2020, at approximately 3:02 pm, defendant a Ukraine citizen, applied for admission into the United States at the Juarez Lincoln Port of Entry in Laredo, Texas, as a passenger in a bus. At primary inspection, defendant presented a United States Passport Card bearing the name and photo of J.K. and claimed to be such person, a United States citizen to CBP Officer Y. Ortiz. Defendant stated that she was going back home to San Antonio, TX. The defendant was asked where she was born and if the document she presented belonged to her. The defendant replied that she was born in Los Angeles, California and affirmed that the document was hers. Due to a facial mismatch the defendant was escorted to secondary as a possible documented false claim to US citizenship. At secondary, queries on the defendant's fingerprints revealed her true identity as being Kateryna SAMARSKA, a citizen of Ukraine born on June 14, 1987. CBP queries also revealed that the defendant had been denied a United States tourist visa at the U.S. Embassy in Ukraine on two previous occasions. Facts are based on the defendant's statements and records of Customs and Border Protection. The defendant was paroled into the United States and an Immigration hold has been placed.

☐ Continued on the attached sheet.
/s/ Cynthia C. O'Bryant*Complainant's signature*Cynthia C. O'Bryant, CBP Enforcement Officer*Printed name and title*

Sworn to before me and signed in my presence.

Date: March 02, 2020*Judge's signature*City and state: Laredo, TexasSam Sheldon, U.S. Magistrate Judge*Printed name and title*